

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-00367-04 DAE
)	
Plaintiff,)	[18 U.S.C. 1956(a)(1)(B)(i),
)	(a)(3), (h) and 2]
vs.)	
)	
SANDFORD JACOBSON, (04),)	
et al.,)	
)	
Defendants.)	DECLARATION OF COUNSEL
)	

DECLARATION OF COUNSEL

LOUIS MICHAEL CHING, does hereby declare the following:

1. Your Declarant was court-appointed to represent the Defendant SANFORD JACOBSON in the above-captioned federal criminal matter;

2. Pretrial conference is presently scheduled for April 24, 2006 @ 10 a.m. and Jury trial is presently scheduled for May 16, 2006 @ 9 a.m.;

3. Your Declarant requests a continuance for the following reasons:

a. The instant case charges money laundering based upon sale of a business with the total transaction exceeding \$400,000;

b. It is a multiple defendant case, where Defendant Maria Barnes is currently moving to compel additional evidence;

c. Your Declarant was appointed only recently on March 15, 2006;

d. Some discovery materials were provided on March 23, 2006 by the government, which reflects search warrants and wire tapings were used by the government;

e. Defendant Sanford Jacobson is 69 y/o, and your Declarant has been unable to personally meet with him to discuss and prepare this case, because Defendant Jacobson has been recently ill and under doctor's medical care;

f. Your Declarant will be on vacation between May 10th and May 24th, 2006;

4. Your Declarant believes in good faith that the instant motion has merit and it is not made for the purpose of delay;

5. Further, your declarant sayeth naught.

I, THE UNDERSIGNED HEREIN, DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED: Honolulu, Hawaii, April 6, 2006.



LOUIS MICHAEL CHING